SB989 Secondary Containment Testing by Stan Brodecki XXX Environmental Management

Non Testable Secondary Containment Systems and

When a segment of your Secondary Containment System Fails

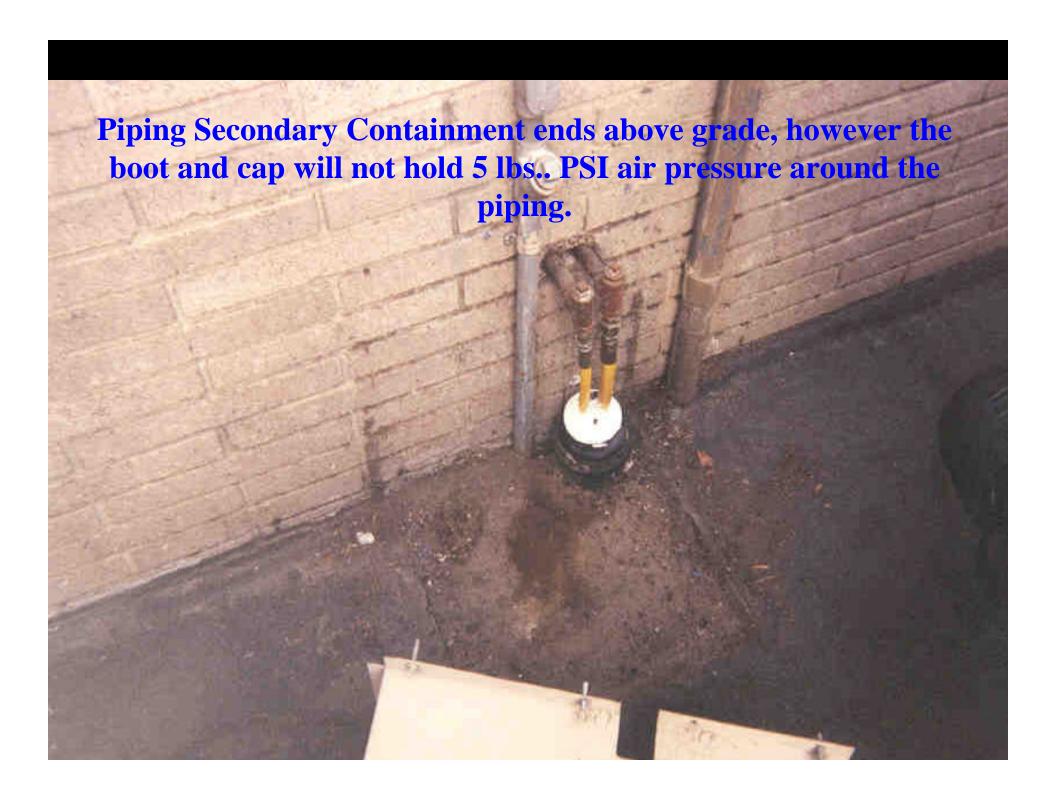
- History In 1984 1985 the SWRCB adopted new regulations requiring double wall UST's and piping systems.
- These regulations preceded technology as do the new regulations of today.
- As we all know the first few years that double wall UST systems were built, only existing hardware and entrepreneurial hardware was available, while more permanent solutions were still in designed and in testing (UL, Third Party).

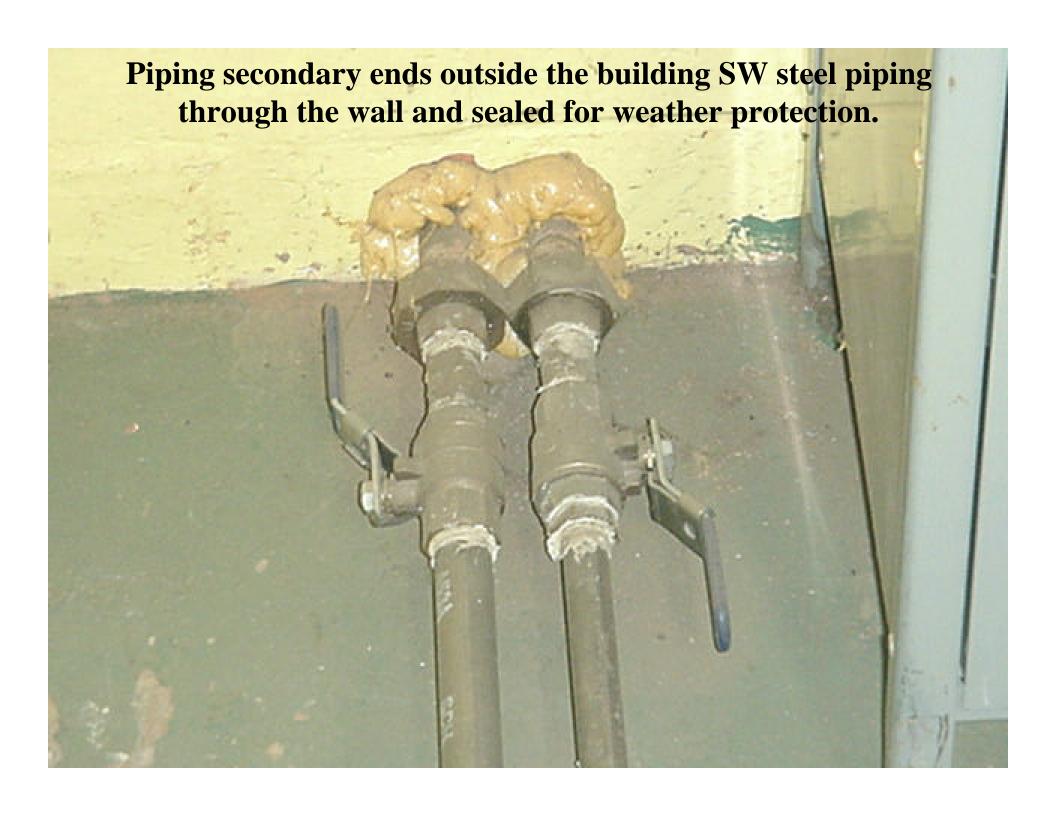
- Many Corporations acting in good faith and as good corporate citizens went out and installed a large number of double wall UST Systems from 1985 -1992.
- 1992 is about when proven technology started to catch up with the regulations.
- For Standby/Emergency Generators UST Systems - This technology is still being developed.

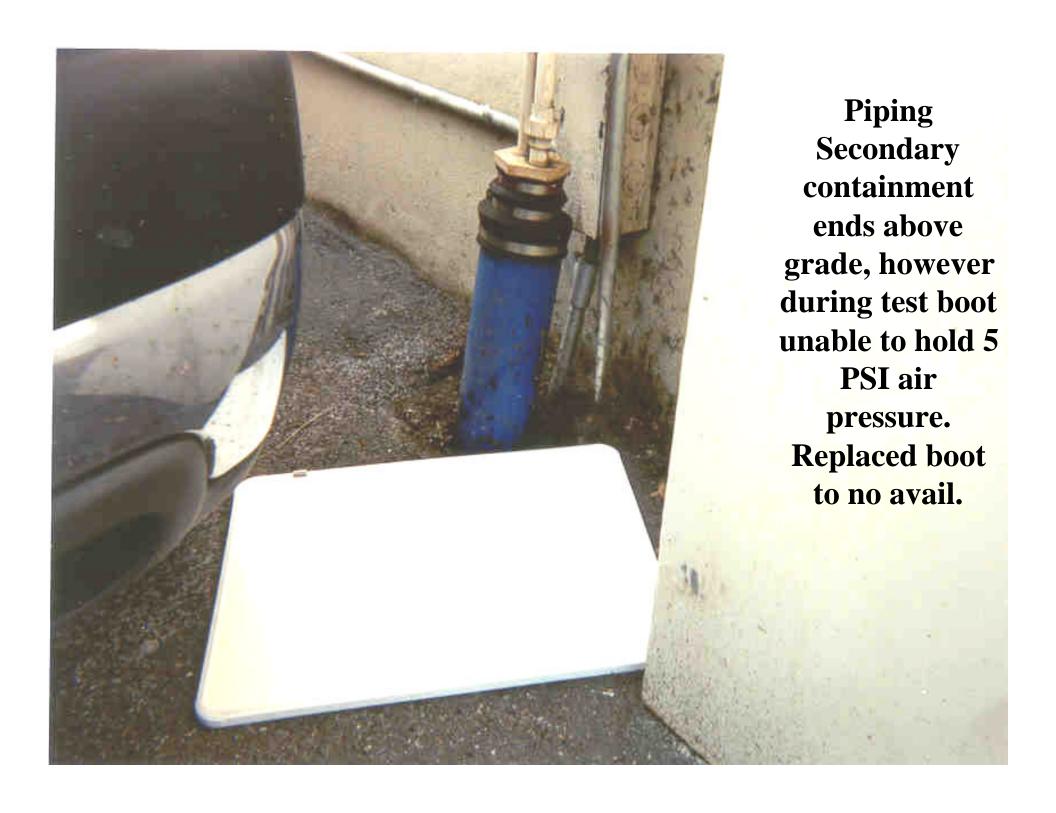
- Today we are now required to retest our existing Secondary Containment systems many of them dating as far back as 1985.
- Some of the many problems encountered in trying to test these UST Systems can be found in the design and hardware that was available at the time of installation.

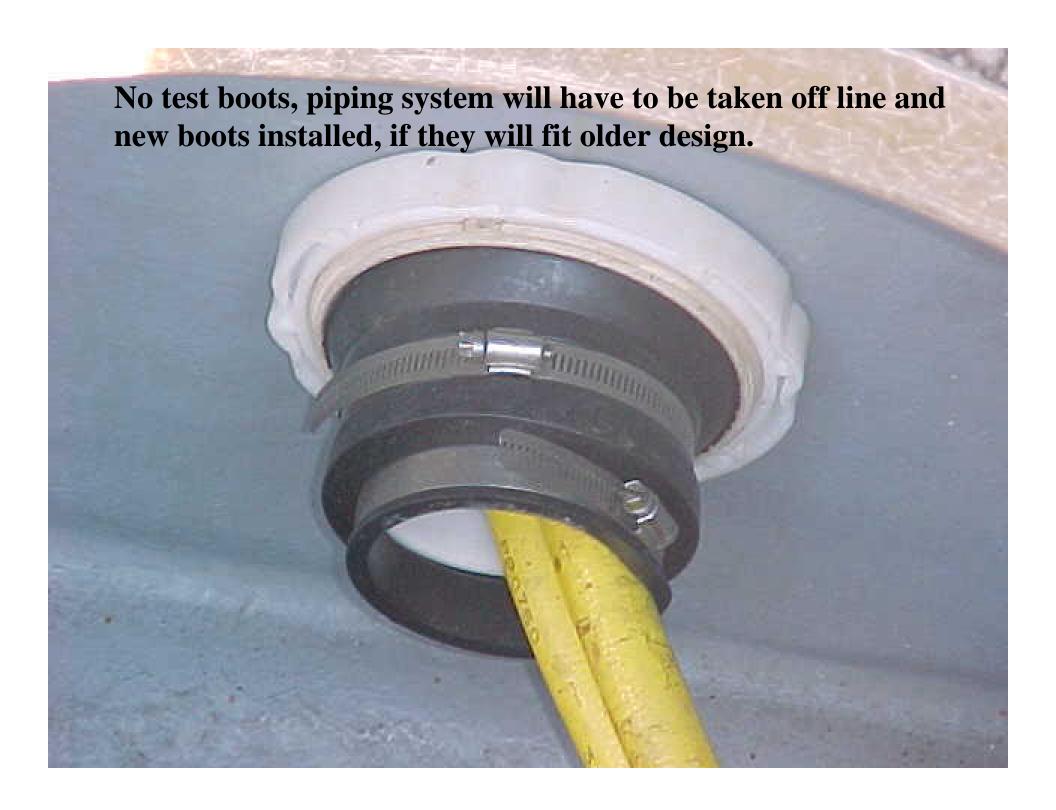
- Standby/Emergency Generators are particularly difficult to test because of their design and available hardware and technology.
- Following are some of the problems you are faced with when trying to test
 Standby/Emergency Generator Systems
- Secondary Contained Piping is particularly difficult.



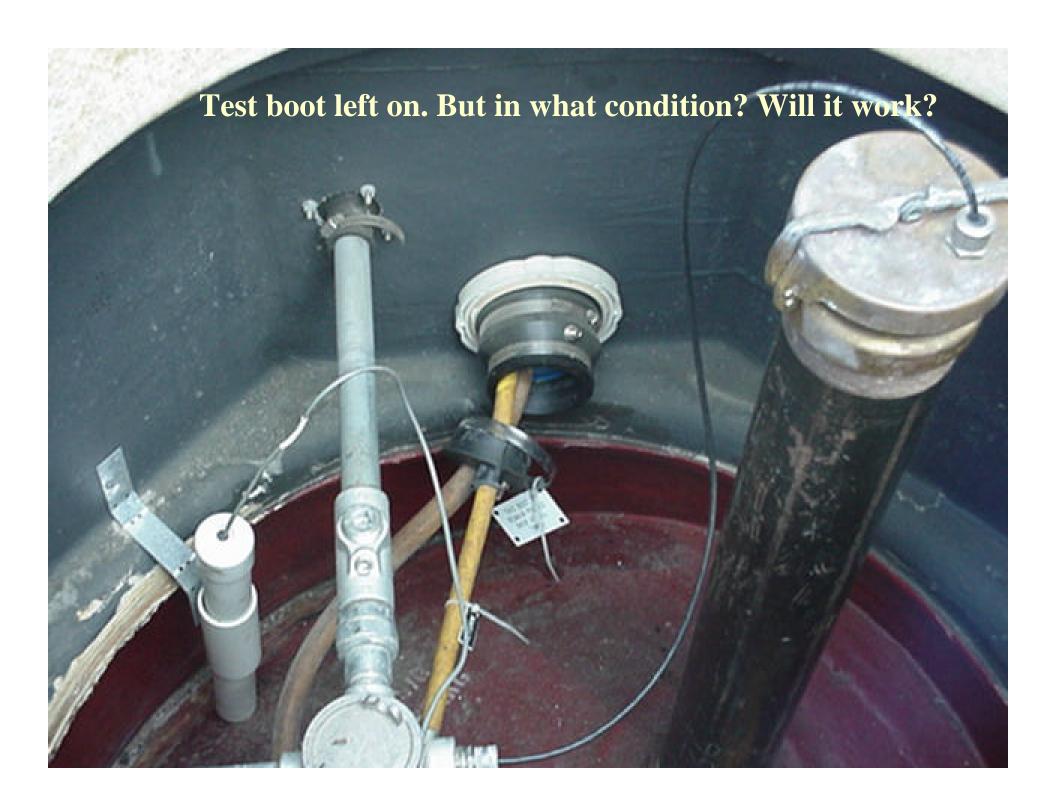






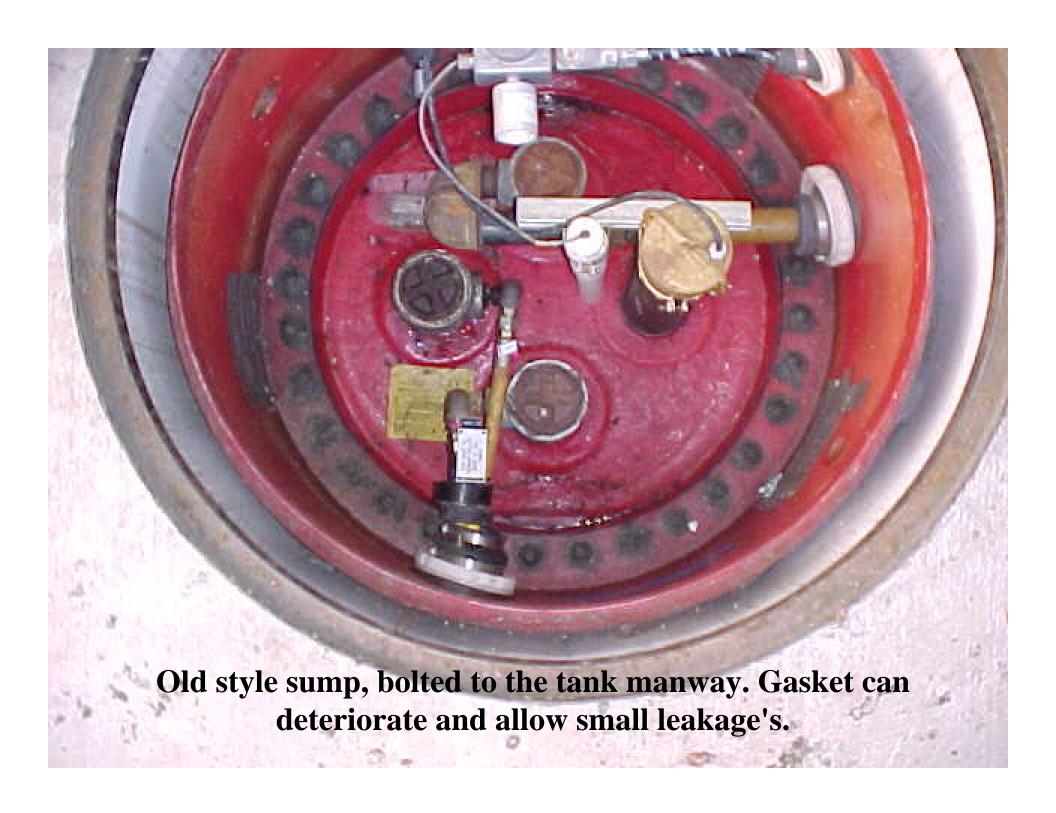




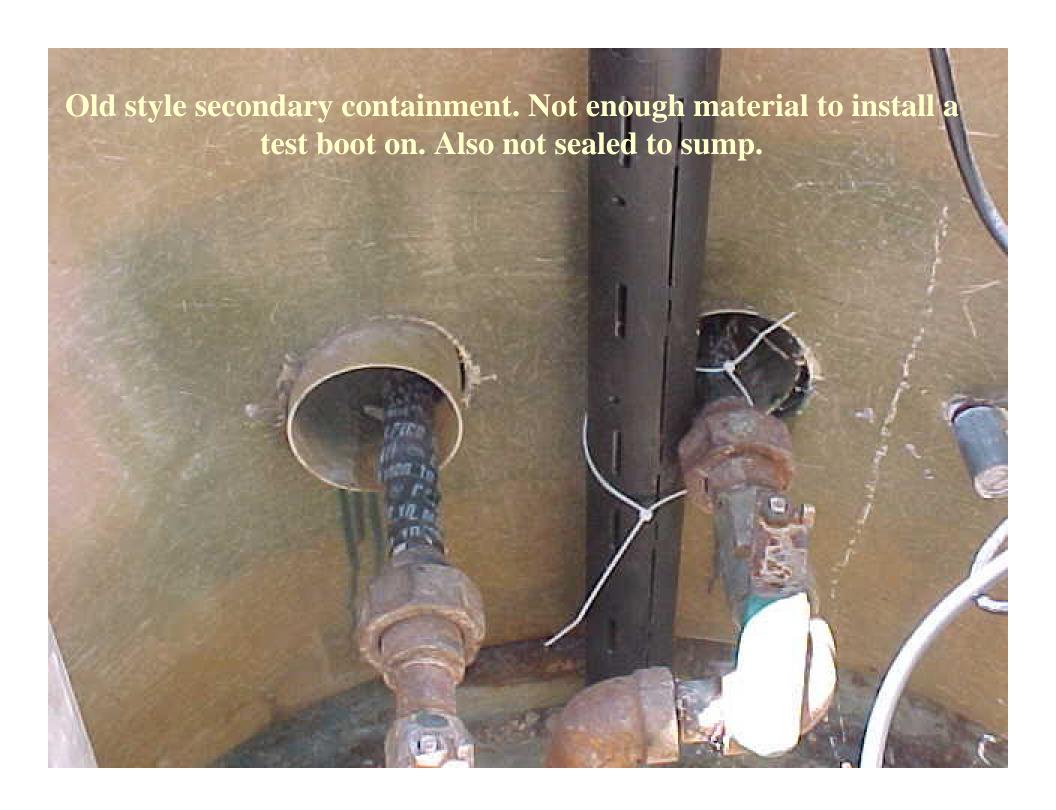


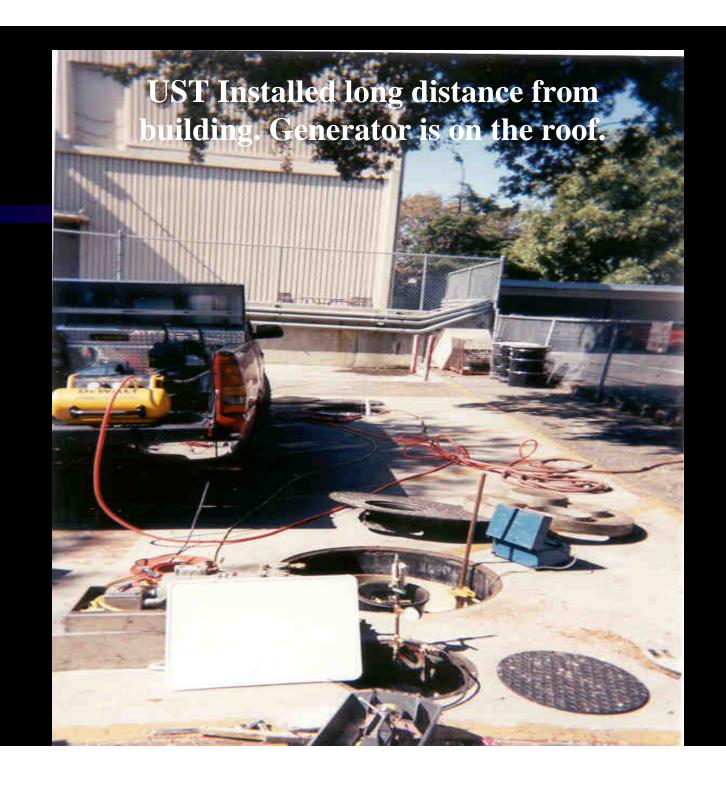


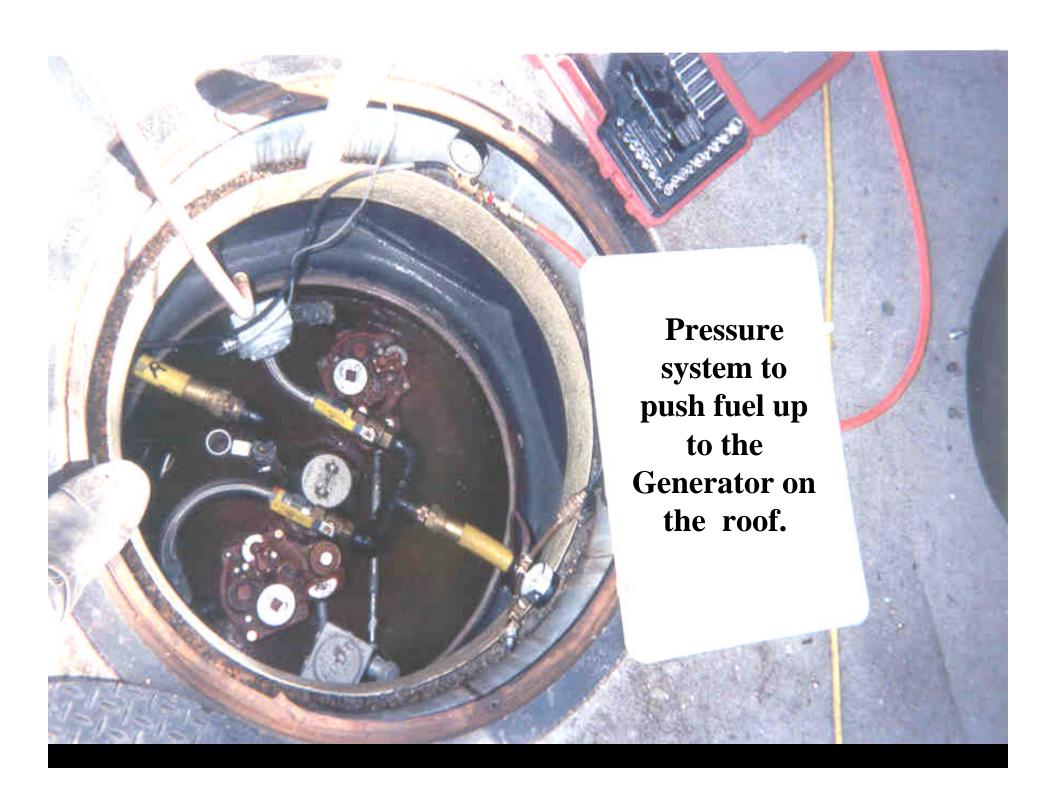


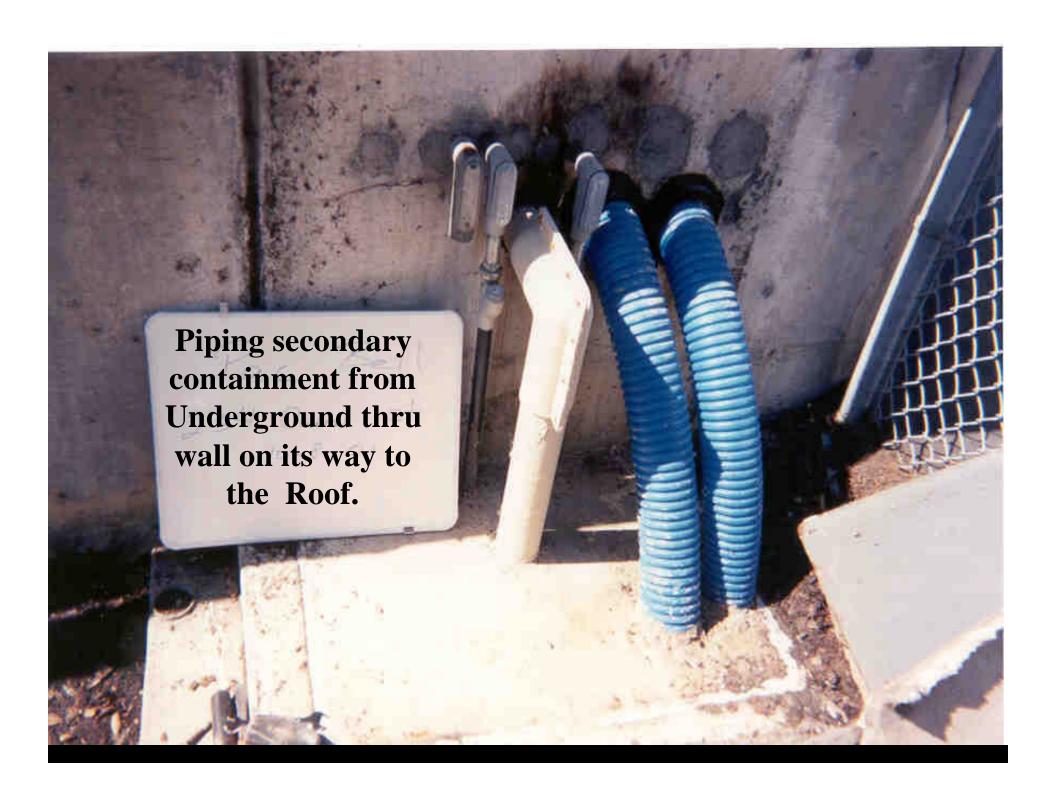


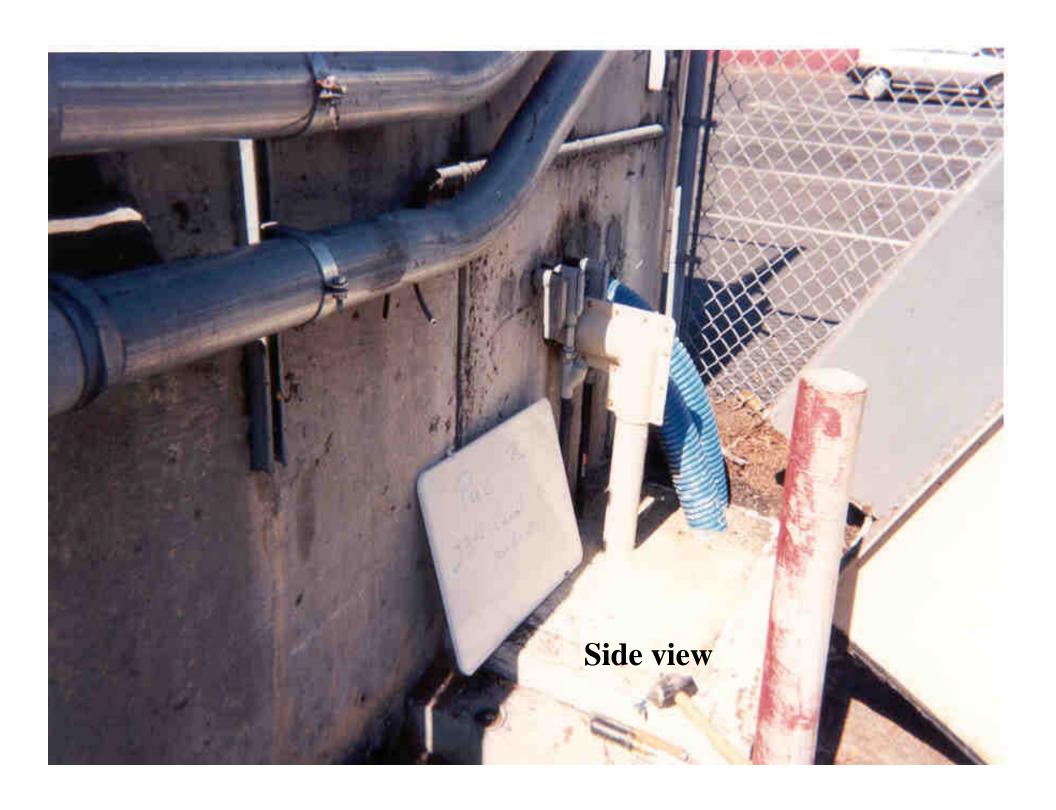




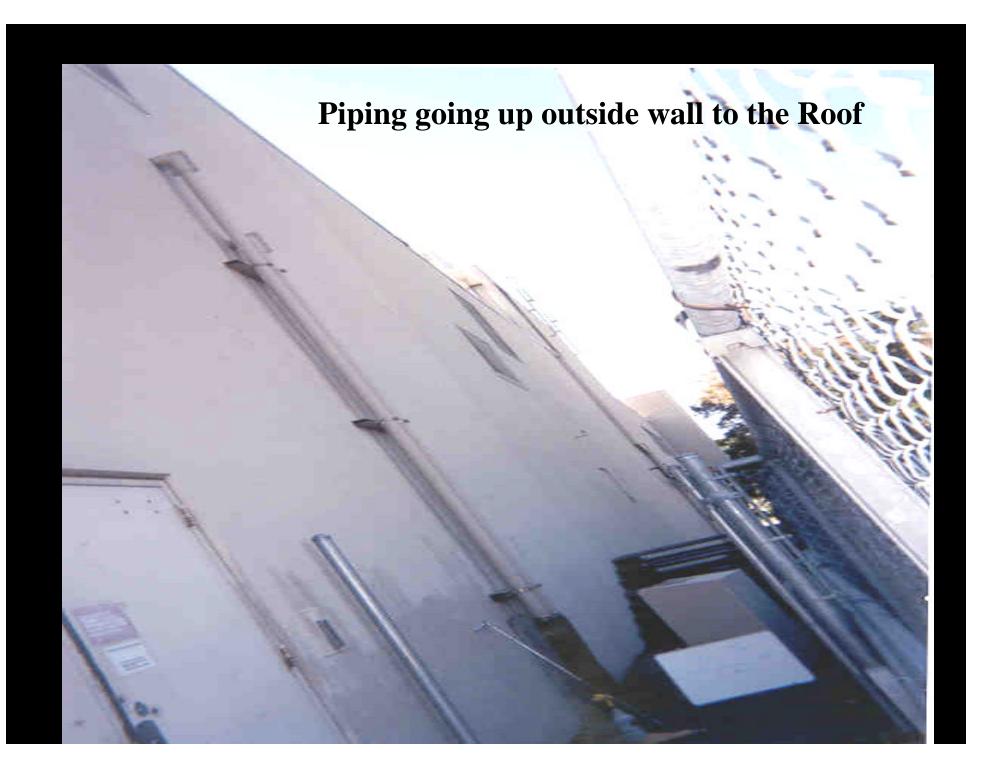












- The repair/corrective action to these types of UST Systems is many times a complete tank top upgrade with new compatible materials at a cost of \$50,000 to \$60,000.
- The minimum corrective action in many cases is replace the supply and return piping system and/or replacing the sump(s). This requires cutting concrete and replacing the manways on top of the tank.

- The population of Standby/Emergency Generator UST's is equal to the number of petroleum industry UST's.
- However these UST's pose a lot less risk. Most have suction systems and use diesel fuel.
- These UST's are owned and operated by many Non Petroleum Corporations who are not in the petroleum business. These Generators/engines with UST's do not generate any revenue and are an expense against the bottom line.

- Because these systems do not contribute to the bottom line they are classified (tax wise) differently. Many times a certain type of work or dollar amount requires that Capital Dollars used and expensed.
- Obtaining Capital dollars expenditure for a non profit center is difficult at the best of times.

- With the current recession the Xxxxxxxxxx industry has cut back its capital expenditures by 20 %.
- At XXX All Capital Dollar expenditures must be submitted as a business case to Capital Management, City, State. Capital projects exceeding \$2 Million Dollars require a long form Business Case be submitted and approved by a Senior VP.

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- The long form Business Case requires a Net Present Value Model be submitted. (fun)
- XXXX has 200 plus UST installed before 1992. And 300 Plus installed after 1992 that are being Secondary Containment Tested with numerous testing problems and dispenser pan installation on fleet vehicle refueling UST's. XXX's California cost is expected to reach over \$16 Million Dollars by the end of the program. 28

- This is a major expense in such a short time frame. More time is required to obtain capital dollar approval and then time (drawing, permits, contractors availability, etc.) to completed the required corrective actions for over 400 UST's.
- Suggestion UST Systems that are not testable and/or have some component fail secondary testing be treated as single wall systems until such time they can be brought into compliance.

- Current Regulations (Section 2637(a)(1) Title 23 Division 3 Chapter 16 CCR) allows for the replacement of secondary containment systems with a system that can be tested by July 1, 2005.
- This is two and a half years after the Dec. 31, 2002 deadline.

- I would like to propose that UST Systems installed before 1/1/2001 that are not testable or have a secondary component failure be allowed to operate under Sec. 2637(a)(1).
- The additional two and half years is very valuable time that is required to successfully complete this program.

- I would like to Thank the Panel and the Board for their time today and ask that you take into consideration the conclusions of this presentation.
- If you have any questions or need any additional information please contact me at 925 823 6161. E-mail jb9523@sbc.com